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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

14 LEON B. HOPPE, JR., )  
15 Plaintiff, )  
16 v. )  
17 UNITED STATES OF AMERICA, )  
18 UNITED STATES POST OFFICE, )  
19 UNITED STATES POSTAL SERVICE, and )  
DOES 1 to 100, )  
20 Defendants. )  
21  
22 )  
No. C11-0540 RS  
**STIPULATION TO EXTEND  
DEFENDANT'S DEADLINE FOR  
FILING DISCOVERY MOTION**

## **STIPULATION**

The parties, by and through their counsel of record, hereby stipulate and agree as follows:

23       1. On or about August 5, 2011 and April 19, 2012, defendant served subpoenas for  
24 production of documents on third party, FirstComp Insurance Agency, Inc. ("FirstComp") for,  
25 among other things, documents related to plaintiff and FirstComp's workers compensation file  
26 related to plaintiff. Defendant has not yet received documents in response to its April 19, 2012  
27 subpoena. However, defendant has been informed that FirstComp recently produced documents  
28 responsive to the April 19, 2012 subpoena and will provide additional documents

2. Pursuant to the Court's June 9, 2011 Case Management Order, the fact discovery cut-off in

**1** this action was May 4, 2012. Pursuant to Local Rule 37-3, the last day to file a motion to compel  
**2** fact discovery is May 11, 2012.

3       3. To provide FirstComp additional time to provide documents to defendant and to provide  
4       additional time to resolve any outstanding discovery issues without the need for court  
5       intervention, subject to the Court's approval, the parties, through their undersigned counsel,  
6       hereby agree and stipulate to extend the defendant's deadline to file a motion to compel  
7       compliance with the defendant's subpoena to FirstComp to May 21, 2012.

8       4. On May 9 and May 11, 2012, defendant's counsel contacted an attorney she understands  
9      to represent FirstComp in matters involving the workers' compensation claim related to plaintiff,  
10     and on May 11, 2012, defendant's counsel informed him of defendant's request to extend the  
11     deadline for a motion to compel FirstComp's compliance with defendant's subpoena.

12 || IT IS SO ORDERED.

Respectfully submitted,  
MELINDA HAAG  
United States Attorney

15 | Dated: May 11, 2012

JENNIFER SWANG  
Assistant United States Attorney  
Attorneys for Defendant

KNEISLER, SCHONDEL & HUBBS

20 | Dated: May // , 2012

ROBERT C. HUBBS  
Attorneys for Plaintiff

~~[PROPOSED]~~ ORDER

24 Pursuant to the parties' stipulation and good cause having been shown, it is hereby ordered  
25 that the defendant's deadline to file a motion to compel compliance with defendant's subpoena to  
26 FirstComp is extended to May 21, 2012.

27 IT IS SO ORDERED.

  
RICHARD SEBORG  
UNITED STATES DISTRICT COURT JUDGE